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March 20, 2025

**VIA CM/ECF**

The Honorable José R. Almonte, U.S.M.J  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
Court Room PO 9  
50 Walnut Street  
Newark, New Jersey 07101

**Re: LORENZO v. THE BOROUGH OF PALISADES PARK et al.**  
**Civil Action No.: 2:23-cv-21849-CCC-JRA**

**ASHLEY V. THE BOROUGH OF PALISADES PARK, et al.**  
**Civil Action No.: 22-cv-6285-CCC**

Dear Judge Almonte:

This office represents plaintiffs David J. Lorenzo and Austin Ashley in the above-referenced matters which have been consolidated for discovery purposes. Defendants, the Borough of Palisades Park, Chong Paul Kim, and Suk "John" Min are represented by R. Scott Fahrney, Jr., Esq. Defendants Stephanie Jang and Jae Park are represented by Roshan Shah, Esq. Please accept the following joint letter on behalf of all parties summarizing the status of these cases as directed by the Court in preparation for the March 27, 2025 telephone status conference. (ECF No. 50)

Plaintiffs have supplied answers to interrogatories propounded by defendants, Jang and Park and produced all documents responsive to those defendants'

document demands. On September 16, 2024, Defendants Jang and Park were served with plaintiffs' first set of interrogatories and served responses on January 23, 2025.

As the parties related the parties' joint letter of February 20, 2025 (ECF No. 52), the Borough, Kim, and Min have not responded to plaintiffs' discovery demands which have been outstanding since April of 2024 in the Lorenzo matter and since September of 2024 in the Ashley matter. Defendant's Counsel has assured that responses would be provided by April 20, 2025.

Additionally, on December 4, 2024, the defendants, Borough, Kim, and Min served their initial discovery demands on Mr. Lorenzo (none were issued to Mr. Ashley). Defendants propounded three sets of interrogatories—one for each defendant—that posed 30 (non-identical) questions each or 90 questions in total. Defendants also issued three separate demands for production of documents.

Plaintiffs objected to these demands as they were served well beyond the time set by the Court in its Pretrial Scheduling Order entered on March 25, 2024 (ECF No. 15), or any of the three amendments to that order on April 16, 2024 (ECF No. 17), August 21, 2024 (ECF No. 46), or December 4, 2024 (ECF No. 51). Nevertheless, in an effort to avoid court intervention, plaintiffs asked those defendants to review plaintiffs' responses to Jang and Park's discovery demands and identify five to ten of their 90 questions that may be specific to their clients' particular interests.

Defendants responded by serving two sets of interrogatories earlier this week on each of the plaintiffs. Defendants March 18, 2025 interrogatories pare down their demands to 37 non-identical questions (20 from the Borough and 17 from Park and Min together). Plaintiffs do not object to providing responses to these discovery demands so long as the Court allows paper discovery to continue. We expect that responses would be provided by April 30, 2025.

Due to the delays in completing paper discovery, depositions have not been taken. The parties request an extension of fact discovery though July 31, 2025 to address this, taking into account scheduling issues that may arise due to upcoming trials and scheduled vacations.

Similarly, the parties request an extension of expert discovery to include service of affirmative expert reports by September 30, 2025, responding expert reports by October 31, 2025, and expert depositions by December 15, 2025.

The parties look forward to discussing the status of these matters during the upcoming telephone conference on March 27, 2025.

Respectfully,

s/ Leonard Seaman  
LEONARD E. SEAMAN

LES/me

cc: All counsel (via CM/ECF)  
client (via e-mail)